

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-40253-FDS

DAVID BREMNER, Individually and as Father)
and Next Friend of MOLLY BREMNER, and)
VICKI BAKER,)
Plaintiffs)
vs.)
A.B. CHANCE COMPANY and HUBBELL)
INCORPORATED,)
Defendants)

DEFENDANTS' MOTION TO COMPEL DISCOVERY RESPONSES

Now come the Defendants, pursuant to Rule 37 of the Federal Rules of Civil Procedure, and hereby request this Honorable Court issue an Order compelling the Plaintiffs to answer interrogatories and document requests propounded by the Defendants on or about September 30, 2005.

As grounds for this Motion, the Defendant states that they propounded interrogatories and document requests to Plaintiffs on September 30, 2005. The Defendants granted an extension to the Plaintiff through December 30, 2005, but have yet to receive any response.

WHEREFORE, the Defendants request this Honorable Court issue and Order compelling the Plaintiffs to provide Answers to Interrogatories within fourteen (14) days of the date of the Order.

The Defendants
By their attorneys,

WYNN & WYNN, P.C.

/s/ John A. Walsh
John A. Walsh BBO#560072
90 New State Highway
Raynham, MA 02767
(508) 823-4567

CERTIFICATION

Pursuant to Local Rule 7.1, I hereby certify that I have conferred with Plaintiffs' counsel in good faith in an effort to resolve this discovery dispute.

/s/ John A. Walsh
John A. Walsh BBO#560072

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney of record for each other party by mail on January 5, 2006.

/s/ John A. Walsh
John A. Walsh